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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	No. CR 05 00284 SI
)	
Plaintiff,)	[PROPOSED] ORDER AND
)	STIPULATION FOR CONTINUANCE
v.)	FROM MARCH 24, 2006 TO APRIL 21,
)	2006 AND EXCLUDING TIME FROM
AKRAM SABAR CHAUDHRY,)	THE SPEEDY TRIAL ACT
a.k.a. Akram Sabar, and)	CALCULATION (18 U.S.C. §
MOHAMMAD ADIL)	3161(h)(8)(A))
a.k.a. Adil Mohammad,)	
Defendants.)	

With the agreement of the parties, and with the consent of the defendants, the Court enters this order continuing a scheduling and trial setting appearance before the district court from March 24, 2006 to April 21, 2006 at 11:15 A.M. before the Honorable Susan Illston, and documenting the defendant's exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(b), from March 24, 2006 to April 21, 2006. The parties agree, and the Court finds and holds, as follows:

1. The defendants agree to an exclusion of time under the Speedy Trial Act. Failure to grant the requested continuance would unreasonably deny defense counsel reasonable time necessary for effective preparation, taking into account the exercise of due diligence as set out below:

a. The government has determined that additional discovery is warranted and is in the process of scanning all discoverable records to include the supplemental materials.

b. The government has determined that re-translation of a number of taped conversations from the Urdu language to the English language is warranted and has initiated this process.

2. Given these circumstances, the Court finds that the ends of justice served by excluding the period from from March 24, 2006 to April 21, 2006, outweigh the best interest of the public and the defendant in a speedy trial. § 3161(h)(8)(A).

3. Accordingly, and with the consent of the defendant, the Court ordered that the period from from March 24, 2006 to April 21, 2006 be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) & (B)(iv).

IT IS SO STIPULATED:

DATED: March 21, 2006

/s/
STEVEN F. GRUEL, ESQ.
Attorney for Defendant Chaudhry

DATED: March 21, 2006


/s/
DAVID L. ANDERSON, ESQ.
Attorney for Defendant Adil

DATED: March 21, 2006

/s/
BLAKE D. STAMM
Assistant United States Attorney

IT IS SO ORDERED.

DATED: _____


HON. SUSAN ILLSTON
United States District Judge